

# EXHIBIT I

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
"AZZMADOR" RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, LOYAL WHITE KNIGHTS  
OF THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

**DECLARATION OF JESSE W. STEVENSON IN SUPPORT OF PLAINTIFFS'  
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Jesse W. Stevenson, declare as follows:

1. I am Founding Partner at Impact Trial Consulting ("Impact").
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. For over a decade, Impact has been a leading consulting firm focusing on visual communications and technology solutions for the courtroom.
5. As an expert in the field of litigation technology, I have worked on cases arising from the California energy crisis, the 1993 World Trade Center bombings, the Enron scandal, the September 11th World Trade Center attacks, the Deepwater Horizon oil spill, the Lehman Brothers Bankruptcy and other high-profile matters. Impact has also hosted a number of high-profile trials on behalf of the United States Department of Justice, including *United States v. Raniere*, 18-CR-204-1 (NGG) (VMS) (E.D.N.Y. Apr. 29, 2019) (the NXIVM cult leader), and most recently *United States v. Zhukov*, 18-CR-633(EK) (E.D.N.Y. Oct. 27, 2020) (Russian hacker).
6. Since the start of the Covid-19 pandemic, Impact has hosted and provided litigation technology services for several trials, including the first hybrid (in-person/remote) civil jury trial in the Southern District of New York before Judge Lorna G. Schofield. *Syntel Sterling Best Shores Mauritius Ltd. V. Trizetto Grp.*, 15 Civ. 211 (LGS) (S.D.N.Y. Sep. 30, 2020). The trial had witnesses testifying remotely from as far away as India, counsel from Italy and France,

and over 60 remote participants as well as in-person participants in a socially distanced courtroom.

7. Impact's operations have been recognized on the record by Judge Robert L. Hinkle in the Northern District of Florida. Judge Gary R. Brown in the Eastern District of New York has recommended Impact to work on matters and publicly lauded Impact for its work in a voting rights bench trial, *Flores v. Town of Islip*, No. 18-CV-3549 (GRB)(ST) (E.D.N.Y. Oct. 14, 2020).

8. In the present matter, Impact has worked with plaintiffs on the provision of visual aids and other demonstratives.

9. As a licensed government contractor, Impact has been granted the authority to operate *Zoom for Government* (ZoomGov), the most secure Zoom platform available and authorized by the United States Department of Homeland Security.

10. In an effort to alleviate concerns about space in the courtroom, Impact could broadcast the trial in a number of different ways, depending on the Court's and parties' preferences, at no cost to anyone.

11. If Impact is able to utilize the court's internet, Impact could broadcast the trial to any location outside of the courthouse via ZoomGov and control who gets access to the broadcast through the use of passwords, etc. For example, Impact could broadcast the trial to YouTube or IBM Watson for public viewing, or broadcast to a password protected YouTube channel to limit access to proceedings. Impact could also provide access to a limited group of people who "register," so only the chosen group can watch the trial from wherever they choose. The Court could limit viewing based on any set of criteria, such as parties, counsel, or individuals with media credentials.

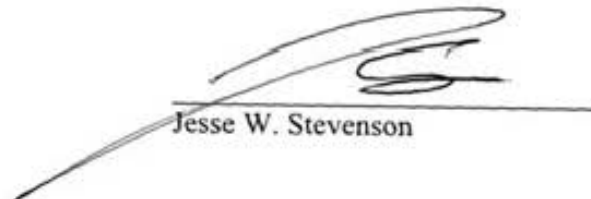
12. Impact is also able to broadcast exclusively to particular locations outside the courthouse or could set up a close-circuit broadcast to another room inside the courthouse.

13. As host, Impact would manage a pre-registration process for all participants, test and train each participant before commencement of the trial, offer monitoring and support for all participants, and create and manage breakout rooms.

14. Impact is committed to providing a safe and secure way to access all parts of the trial according to the preferences of the Court, at no cost.

15. Impact is also willing to refer the Court and parties to other leading vendors in the industry who provide similar services.

16. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2021.



Jesse W. Stevenson